

REMARKS

This Application has been carefully reviewed in light of the Final Office Action mailed March 28, 2007 ("*Office Action*"). Claims 1-8, 11-18, and 21-24 are pending in the Application, and the Examiner rejects all pending claims. Applicant amends Claims 1, 11, and 21-24. Among other places, support for these amendments can be found, *e.g.*, at page 15, line 11 - page 16, line 5 and Table 2. Applicant respectfully requests reconsideration and favorable action in this case.

I. Section 112 Rejections

The Examiner rejects Claims 21-24 under 35 U.S.C. § 112, first paragraph, stating that these claims fail to comply with the enablement requirement. *Office Action*, p. 2-3. As discussed with the Examiner on May 22, 2007, Applicant respectfully submits that Claims 21-24, as amended, comply with the enablement requirement. Thus, Applicant respectfully requests reconsideration and allowance of Claims 21-24.

II. Section 101 Rejections

The Examiner rejects Claims 21-24 under 35 U.S.C. §101, stating that these claims are directed to non-statutory subject matter. *Office Action*, p. 2-3. As discussed with the Examiner on May 22, 2007, Applicant respectfully submits that Claims 21-24, as amended, are directed to statutory subject matter. Thus, Applicant respectfully requests reconsideration and allowance of Claims 21-24.

III. Section 102 Rejections

The Examiner rejects Claims 1-8, 11-18, and 21-24 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 6,008,785 issued Hewlett et al. ("*Hewlett*"), which is a patent granted to the inventor of the present Application. Applicant respectfully traverses this rejection and submits that *Hewlett* does not describe, expressly or inherently, each and every limitation of the claims.

Consider Applicant's independent Claim 1, which, as amended, recites:

A method of creating an image, the method comprising:
operating a display to create a sequence of bit display periods, said bit
display periods comprising:

at least one conflict bit period skewed with respect to other said bit display periods; and
at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit.

Applicant appreciates the Examiner's consideration of and response to Applicant's previously submitted arguments. However, Applicant respectfully submits that *Hewlett* fails to teach each and every element of the amended claim. Among other aspects, *Hewlett* fails to disclose "at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit," as required by Claim 1, as amended.

As teaching "at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits," the *Office Action* points to *Hewlett*, column 9, line 63 through column 10, line 1. *Office Action*, pp. 3-4. But this portion of *Hewlett* fails to teach, or even suggest, an uncorrected error created by said skewing that "caus[es] an actual weight of at least one image bit to differ from a target weight of that image bit," as required by the claim.

In response to Applicant's previously submitted arguments, the *Office Action* argues that *Hewlett* allegedly teaches "at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits," stating:

First in the case that the segments are in the same bit-plane, the segments individually are skewed and create an error of longer display times, but together offset each other. Since, no corrective action is taken these errors are considered uncorrected. In the case that the segments are in different bit-planes, a counterskew is placed somewhere else in the frame to compensate, but the compensating bits still would have uncorrected errors, since compensation merely adjusts for errors that are present.

Office Action, p. 10. As noted by the Examiner, in the first situation, when the "segments are in the same bit-plane, the segments . . . together offset each other." *Id*; see also *Hewlett*, col. 9, ll. 42-52. This fails to teach an uncorrected error that "caus[es] an actual weight of at least one image bit to differ from a target weight of that image bit," as required by Claim 1. As also noted by the Examiner, when the "segments are in different bit-planes, a counterskew is

placed somewhere else in the frame to compensate.” *Office Action*, p. 10; *see Hewlett*, col. 10, ll. 3-5; *id.* at Figure 8. Likewise, this portion of *Hewlett* fails to teach an uncorrected error that “caus[es] an actual weight of at least one image bit to differ from a target weight of that image bit,” as required by the claim.

Thus, *Hewlett* does not describe, expressly or inherently, “at least two compensating bit periods having a bit period such that an uncorrected error created by said skewing occurs during said compensating bits, the uncorrected error causing an actual weight of at least one image bit to differ from a target weight of that image bit,” as required by Claim 1. Independent Claims 11 and 21 include limitations that, for analogous reasons, are not taught by *Hewlett*. Because *Hewlett* does not disclose, expressly or inherently, every element of independent Claims 1, 11, and 21, Applicant respectfully requests reconsideration and allowance of Claims 1, 11, and 21 and their respective dependent claims.

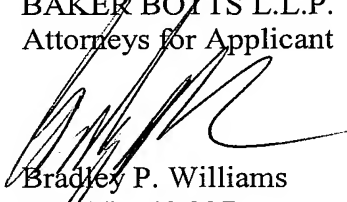
CONCLUSION

Applicant has made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

Applicant believes no fees are due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 20-0668 of Texas Instruments Incorporated.

Respectfully submitted,

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